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March 15, 2023

VIA E-MAIL

The Honorable Laura Taylor Swain
Chief United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Gregoire Tournant*, 22-cr-276 (LTS)

Dear Chief Judge Swain:

We respectfully submit this letter pursuant to defendant Gregoire Tournant's application in the above-referenced matter to file certain materials under seal. *See* Individual Practices B.4. Specifically, Mr. Tournant requests the Court's permission to file limited portions of his Omnibus Reply Memorandum of Law in Support of his Pre-Trial Motions (the "Omnibus Reply") under seal, as reflected in the attached copy of Mr. Tournant's Omnibus Reply with his proposed redactions highlighted. The information that Mr. Tournant proposes to file under seal reflects Mr. Tournant's attorney-client privileged information. Mr. Tournant has filed his proposed redacted Omnibus Reply on ECF.

We thank the Court for its consideration.

Respectfully submitted,

/s/ Seth L. Levine

Seth L. Levine

Alison M. Bonelli

cc: Daniel R. Alonso, Esq.
Lisa Korologos, Esq.
Derek Wikstrom, Esq.

The foregoing sealing request is granted, for the reasons discussed above. The unredacted version of the defense's omnibus reply memorandum shall be filed under seal.

SO ORDERED.

3/23/2023

/s/ Laura Taylor Swain, Chief USDJ